


# EXHIBIT 2

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BY HAND AND BY EMAIL

January 8, 2007

The Honorable Vincent J. Poppiti  
Blank Rome LLP  
Chase Manhattan Centre  
1201 Market Street, Suite 800  
Wilmington, Delaware 19801

**Re: LG.Philips LCD Co., Ltd. v. ViewSonic Corporation, et al.;**  
**U.S. District Court Case No. 04-343 JJF**

Dear Special Master Poppiti:

I write on behalf of Plaintiff LG.Philips LCD Co., Ltd. ("LPL") to update you concerning several discovery issues, as discussed during our teleconference with you on December 28, 2006.

## **I. AGREEMENT CONCERNING VIEWSONIC'S DOCUMENT REQUEST 119**

LPL has agreed to produce documents responsive to ViewSonic's document request 119, if any, within a reasonable time. LPL anticipates that production can be completed by January 31, 2007. This agreement resolves ViewSonic's motion concerning Request 119 and avoids the need for any privilege log concerning privileged documents responsive to Request 119, as discussed during the December 28 hearing. See Dec. 28 Tr. at 160.

## **II. AGREEMENT CONCERNING INSPECTION OF VIEWSONIC DOCUMENTS**

LPL and ViewSonic have agreed that LPL will inspect ViewSonic's documents concerning imports, shipments, etc., on January 16-17, 2007 (subject to further inspection, if necessary, as ViewSonic is still confirming the volume of documents). LPL will be able to obtain copies of documents produced by ViewSonic.

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### **III. VIEWSONIC'S DOCUMENT REQUESTS 71-74 & 118**

Counsel for LPL has further investigated whether LPL makes any products that may practice any claims of the Patents-in-Suit. LPL does sell LCD module products with certain frames. We have confirmed, however, that LPL does not sell LCD modules for computer monitors that could be used for rearmounting as claimed in the Patents-in-Suit. We have also determined that LPL sells LCD modules for televisions that have a different structure. As a result, LPL recently has been selling LCD modules for televisions that could be used by third party assemblers in a way that practices LPL's rearmounting technology claimed in the Patents-in-Suit, depending on the construction of the claims and how third parties assemble finished products that incorporate LPL's modules. LPL's counsel will, therefore, meet and confer with ViewSonic's counsel promptly to discuss the extent to which LPL should produce additional discovery concerning ViewSonic's Document Requests # 71-74 and 118.

### **IV. DISCUSSIONS CONCERNING INSPECTION AND SHIPMENT OF TATUNG'S PRODUCTS**

During the December 28 hearing, Tatung's counsel agreed to ship to the East Coast "smaller" products being produced by Tatung. See Dec. 28 Tr. at 197 ("The smaller ones that have come from Taiwan, not Korea, but Taiwan, are boxed in original boxes and could be shipped, they could be shipped air freight in some manner."). On January 4, counsel for LPL proposed that Tatung ship products that weigh less than 100 pounds. On January 5, Tatung's counsel responded by denying his prior representations and refused to discuss any shipment of any of the 26 products to the East Coast, contrary to the December 28 hearing. Attached as Exhibit 1 are copies of the correspondence exchanged between counsel.

To resolve this dispute, LPL will agree for its counsel and expert to inspect in California all of the 26 products currently ready for inspection. The parties have set January 16-17, 2007 as the inspection dates. Tatung agrees to produce all future products for inspection at the office of Tatung's counsel in Wilmington, Delaware, regardless of size. See Ex. 1.

### **V. TATUNG DEFENDANTS' CLASSIFICATION OF PRODUCTS BY MOUNTING SYSTEM**

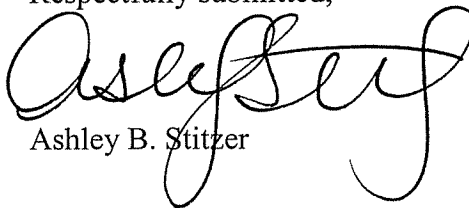
During the December 28 hearing, Tatung's counsel agreed that Tatung would classify its products by mounting system, and further agreed to confirm this could be done for both Tatung and Tatung America products. LPL has not received any further communication from Tatung on this issue, and LPL understands that Tatung will provide the product classifications and related

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information by January 19, 2007, as agreed. In the event that Tatung attempts to resist classification of its products, LPL respectfully requests an opportunity to address this matter with the Special Master at the January 19 hearing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ashley B. Stitzer". The signature is fluid and cursive, with a large, stylized initial "A".

Ashley B. Stitzer

cc: Counsel as shown on the attached certificate

# **EXHIBIT 1**

# Greenberg Traurig

Frank E. Merideth, Jr.  
Tel. 310.586.7825  
Fax 310.586.0275  
MeridethF@gtlaw.com

January 5, 2007

## VIA EMAIL AND FIRST CLASS MAIL

Derek Auito, Esq.  
McKenna Long & Aldridge LLP  
1900 K Street, N.W.  
Washington, D.C. 20006

Re: LG. Philips, LCD Co., Ltd v. Tatung Company

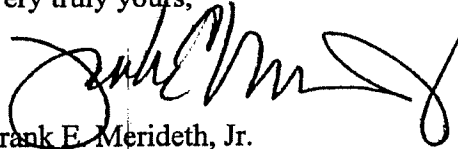
Dear Mr. Auito:

This is in response to your letter of January 4, 2007.

With regard to your first paragraph, you have taken my statement out of context, ignored the Special Master's recommendation and disregarded the parties' agreement. Mr. Ambrozy offered and I agreed to have the monitors inspected at my offices in Santa Monica.

The 26 monitors will be available in my office in Santa Monica, California on January 16 and 17, 2007, the date you requested. We are not shipping any monitors to your or GT's office in Washington, D.C. Any additional monitors that are produced will be made available at Richards, Layton & Finger in Wilmington, Delaware.

Very truly yours,



Frank E. Merideth, Jr.

FEM:cdb

cc: Anne Gaza, Esq. (via email)

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BOCA RATON  
BOSTON  
BRUSSELS\*  
CHICAGO  
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# **EXHIBIT 2**

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January 4, 2007

**VIA E-MAIL AND. U.S MAIL**

Frank E. Merideth, Jr.  
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MeridethF@GTLAW.com

**Re: *LG.Philips LCD Co., Ltd. v. ViewSonic Corporation, et al.*;  
U.S. District Court Case No. 04-343 JJF**

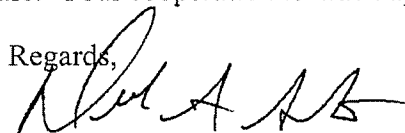
Dear Mr. Merideth:

During the December 28, 2006 teleconference, you agreed to ship the "smaller" monitors of the 26 Tatung monitors located at your California office that are available for inspection to your Washington, DC office. In accord, please ship all monitors that weigh less than 100 pounds to your Washington, DC office by the week of January 12th so that we may inspect them. LPL agrees to pay for all shipping costs.

We are available to inspect the "very large" monitor(s) you referenced during the teleconference (e.g., anything larger than 100 pounds), at your California office on January 16 and 17th. Please let us know your availability so that we may make travel arrangements. Also, please provide us with a description of the "very large" monitors that will not shipped; e.g., size, weight, type of monitor (computer monitor, television, etc.), etc.

Finally, per Special Master Poppiti's request, please confirm that we (LPL and Tatung) will operate per this procedure for all monitors that Tatung will produce for LPL's inspection in the future. Your cooperation is much appreciated.

Regards,



Derek Auito

DAA:ae

cc: Mark Krietzman (e-mail)

DC:50454090.1



**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that, on January 8, 2007, copies of the foregoing document were served as follows:

BY EMAIL AND BY HAND:

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